

EXHIBIT 6

to Memo iso Motion to Compel Production

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**MARK F. GUIMOND and KALLIE A.
GUIMOND, on behalf of themselves and
others similarly situated,**

Plaintiffs,

v.

**TOYOTA MOTOR CREDIT
CORPORATION,**

Defendant.

C.A. No. 3:12-cv-00606-JAG

DECLARATION OF RYAN J. ROSNER


I, Ryan J. Rosner, declare as follows:

1. I am an associate in the Washington, D.C. office of Sheppard Mullin Richter & Hampton LLP and prepared the exhibits attached to Defendant Toyota Motor Credit Corporation's ("Defendant" or "TMCC") Memorandum of Law in Support of its Motion to Compel.
2. A true and correct copy of Defendant's First Set of Requests for Production of Documents is attached to TMCC's Memorandum of Law as Exhibit 1 thereto.
3. A true and correct copy of Plaintiffs' Objections to Defendant's First Set of Requests for Production of Documents is attached to TMCC's Memorandum of Law as Exhibit 2 thereto.
4. A true and correct copy of e-mails exchanged between Defendant's counsel and Plaintiffs' counsel on December 11, 2012, through December 13, 2012, is attached to TMCC's Memorandum of Law as Exhibit 3 thereto.

5. A true and correct copy of e-mails exchanged between Defendant's counsel and Plaintiffs' counsel on December 28, 2012, through January 4, 2013, is attached to TMCC's Memorandum of Law as Exhibit 4 thereto.

6. A true and correct copy of e-mails exchanged between Defendant's counsel and Plaintiffs' counsel on December 11, 2012, through December 13, 2012, is attached to TMCC's Memorandum of Law as Exhibit 5 thereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Ryan J. Rosner

Executed on January 10, 2013